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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LIXIN AZARMEHR *et al.*,

Plaintiffs,

v.

WELLS FARGO CLEARING SERVICES
LLC (a/k/a WELLS FARGO ADVISORS),

Defendant.

Case No. 2:25-cv-00088-APG-BNW

**JOINT MOTION TO STAY DISCOVERY
UNTIL THE RESOLUTION OF
DEFENDANT'S MOTION TO DISMISS**

1 Plaintiffs Lixin Azarmehr; JL Real Estate Development Corporation; Nevada Skilled Nursing
2 Lender, LLC; and Nevada Skilled Nursing Development, LLC (collectively “Plaintiffs”), and
3 Defendant Wells Fargo Clearing Services, LLC (a/k/a Wells Fargo Advisors) (“Defendant”), by and
4 through their undersigned counsel, jointly move the Court for the entry of an order staying all
5 discovery, including the need to file a discovery plan, until the Court rules on Defendant’s pending
6 motion to dismiss the amended complaint, which Defendant filed April 7, 2025.

7 Plaintiffs filed their complaint on January 14, 2025, and served Defendant on January 15,
8 2025. ECF Nos. 1, 6. On March 7, 2025, Defendant filed its motion to dismiss the complaint. ECF
9 No. 15. On March 28, 2025, Plaintiffs filed an amended complaint with an errata to the amended
10 complaint to include exhibits being filed on March 31, 2025. ECF Nos. 24, 25. The amended
11 complaint alleges seven causes of action and concerns events taking place over an eight-year period
12 (if not longer). *Id.*

13 Defendant’s motion to dismiss the initial complaint was denied as moot on March 31, 2025.
14 ECF No. 26. On April 7, 2025, Defendant filed a motion seeking dismissal of all claims in the
15 amended complaint. ECF No. 29. Briefing on the motion is scheduled to conclude on June 13,
16 2025. *Id.* The parties conferred and agreed to submit this joint motion.

17 Good cause exists for a motion to stay discovery in this matter, including the need to file a
18 proposed discovery plan. ECF No. 31. If granted, Defendant’s pending motion to dismiss would
19 dispose of the entire case. The parties have no other pending matters before the Court and no trial
20 date has been set. Further, the number and nature of the claims and the lengthy time period involved
21 indicate that discovery in this action is likely to be both time consuming and costly. The parties
22 agree that they will be in a better position to discuss the scope of discovery needed, if any, once they
23 receive a ruling on Defendant’s motion to dismiss, thereby preventing undue burden and expense
24 and contributing to the inexpensive determination of this case.

25 For all the foregoing reasons, the parties respectfully request that the Court grant this motion
26 and enter an order staying all discovery until 21 days after the Court decides Defendant’s motion to
27 dismiss the amended complaint. This is the parties’ first request for a stay of discovery.

28 IT IS SO STIPULATED.

1 Dated: May 16, 2025

Respectfully submitted,

2 BRYAN CAVE LEIGHTON PAISNER LLP

3 /s/ Emmet P. Ong

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9 Dated: May 16, 2025

Respectfully submitted,

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11 /s/ Jared R. Butcher

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17
18
19 **ORDER**

20 For good cause shown, **IT IS HEREBY ORDERED, ADJUDGED, AND DECREED** that
21 the foregoing motion requesting a stay of discovery is **GRANTED**.
22

23 IT IS SO ORDERED

24 
25 _____
26 UNITED STATES MAGISTRATE JUDGE

27 Date: May 19, 2025
28

CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5(b), and Section IV of the District of Nevada Electronic Filing Procedures, I hereby certify that I am an employee of Bryan Cave Leighton Paisner LLP and that on the 16th day of May 2025, I served a true and correct copy of the foregoing JOINT MOTION TO STAY DISCOVERY UNTIL THE RESOLUTION OF DEFENDANT’S MOTION TO DISMISS, via electronic service through the Court’s CM/ECF Filing System, to all parties and counsel as identified on the court-generated Notice of Electronic Filing.

/s/ Callie Kutasi